

JP:MEG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

14-1353

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 49, U.S.C., § 46504; T. 18 ,
U.S.C. §113(5))

SHAHBAZ KAHN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Aaron Carp, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about April 13, 2014, the defendant SHAHBAZ KAHN, while being an individual on an aircraft in the special maritime and territorial and aircraft jurisdiction of the United States, did knowingly and intentionally assault and intimidate flight attendants of the aircraft, interfere with the performance of the duties of the attendants and lessen the ability of the attendants to perform those duties.

(Title 49, United States Code, Section 46504; Title 18, United States Code, Section 113(5).)

The source of your deponent's information and the grounds for his belief are as follows:


1. On April 13, 2014, your deponent was notified that there had been a disturbance on Turkish Airlines Flight 1 as it flew from Istanbul, Turkey to John F. Kennedy International Airport in Queens, New York.

2. All of the following information was relayed to your deponent from interviews with passengers and flight crew that were aboard Flight 1. The defendant SHAHBAZ KAHN had been a passenger on the above-referenced flight. Approximately halfway through the flight, the defendant became belligerent and confronted another passenger who was using a laptop and accused the passenger of stealing the defendant's laptop. During the confrontation that ensued, the defendant spit on the passenger with the laptop and the passenger that was seated beside the passenger with the laptop.

3. Members of the flight crew approached the defendant, and the defendant's unruly behavior further escalated. The defendant ran down the aisle of the plane and across the center row of seats, climbing over the passengers seated there, and then ran down the opposite aisle of the plane where he attempted to lunge at a passenger. The defendant was confronted by flight attendant #1 who attempted to physically restrain him. The defendant resisted flight attendant #1's attempts to restrain him, and during the physical altercation, the defendant punched flight attendant #1 in the face, which caused flight attendant #1's nose to bleed profusely, and kicked flight attendant #1 in the groin. The defendant also punched flight attendant #2 in the arm and grabbed flight attendant #2's wrist, which caused flight attendant #2's watch to break. The defendant also kicked flight attendant #3 in the stomach. Ultimately, members of the flight crew, with additional assistance from passengers aboard the flight, were able to restrain the defendant and secure him in a seat.

4. It is your deponent's understanding that the plane in question is a "civil aircraft of the United States," pursuant to 49 U.S.C. § 46501(2)(a), in that it is registered by Turkish Airlines under Chapter 441 of Title 49. See 49 U.S.C. § 40102(a)(17).

WHEREFORE, your deponent respectfully requests that defendant SHAHBAZ KAHN be dealt with according to law.



AARON CARP
Special Agent
Federal Bureau of Investigation

Sworn to before me this
14th day of April, 2014

Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York